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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HASAN RASHEED MCCAULE,  
  
Defendant.

CASE NO. 2:20-CR-00111-WBS

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: January 6, 2021  
TIME: 10 a.m.  
COURT: Hon. William B. Shubb

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this Court set this matter for an evidentiary hearing on defendant's motion to suppress on January 6, 2021.
2. By this stipulation, defendant and the government now move to continue the hearing until March 4, 2021 at 10:00 a.m., and to exclude time between January 6, 2021, and March 4, 2021 at 10:00 a.m., under 18 U.S.C. Section 3161(h)(1)(D) and (h)(2)(3)(A).
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Defendant filed a motion to suppress on October 28, 2020, and time has been excluded since that date by operation of 18 U.S.C. Section 3161(h)(1)(D).
  - b) The defendant requires additional time to consult with his attorney, review

discovery, investigate, and otherwise prepare for the evidentiary hearing on the motion to suppress, as well as review possible additional charges and negotiate a possible resolution.

c) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

d) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of January 6, 2021 to March 4, 2021 at 10:00 a.m., inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(1)(D) and (h)(2)(3)(A).

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: January 5, 2021

McGREGOR W. SCOTT  
United States Attorney

/s/ VINCENZA RABENN  
VINCENZA RABENN  
Assistant United States Attorney


Dated: January 5, 2021

/s/ NOA OREN  
NOA OREN  
Counsel for Defendant  
HASAN RASHEED McCAULE

### FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED.

Dated: January 5, 2021

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE